

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
CINCINNATI DIVISION

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

THE TWINS GROUP – PH, LLC d/b/a PIZZA HUT

Defendant.

)
)
)
) CIVIL ACTION NO. 10-514
)
)
) JURY TRIAL DEMAND
)
)
)
)

AGREED MOTION TO ENTER CONSENT DECREE

Plaintiff, Equal Employment Opportunity Commission, and Defendant, The Twins Group – PH, LLC d/b/a Pizza Hut, hereby move that the Court sign and enter the Consent Decree which is filed concurrently with this Motion. In support of this Motion, the parties would show as follows:

1. The parties have negotiated a resolution to this lawsuit.
2. The action alleged a violation of the Americans with Disabilities Act of 1990, as amended, and Title VII of the Civil Rights Act of 1964.
3. The Consent Decree, if entered by the Court, will resolve to the satisfaction of the parties all the issues raised in this suit.

WHEREFORE, the parties respectfully request that the Court enter the Consent Decree which is filed with this motion.

Respectfully submitted,

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

s/ Aimee L. McFerren

Aimee L. McFerren

Kentucky Bar No.: 89912

Federal ID No.: 36953

Louisville Area Office

600 Dr. Martin Luther King, Jr. Place

Suite 268

Louisville, KY 40202

502-582-6308

502-582-5435 (fax)

Aimee.mcferren@eeoc.gov

Attorney for Plaintiff

s/ Alan Moldoff

Alan Moldoff

Eckert Seamans Cherin & Mellott, LLC

Two Liberty Place

50 South 16th Street, 22nd Floor

Philadelphia, PA 19102

215-851-8450

215-851-8383 (fax)

amoldoff@eckertseamans.com

Attorney for Defendant